

# United States Department of the Interior

OFFICE OF THE ASSISTANT SECRETARY - INDIAN AFFAIRS



Washington, D.C. 20240

## **National Policy Memorandum**

Assistant Secretary - Indian Affairs Deputy Assistant Secretary - Management

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Title: Charge Card Reallocations

#### 1. Purpose

This memorandum establishes the appropriate procedure required when reallocating charge card transactions. Charge Cards include these types of cards: purchase, travel, fleet, student activity, corporate and fire.

#### 2. Scope

This policy applies to all Indian Affairs (IA) headquarters, field, and program staff under the authority of the Assistant Secretary - Indian Affairs (AS-IA), including the Bureau of Indian Affairs (BIA) and the Bureau of Indian Education (BIE).

#### 3. Policy

It is the policy of IA to comply with federal regulations, and policy and direction from the Department of the Interior (DOI) and the Office of Management and Budget (OMB) to ensure adequate internal controls and reviews are established and implemented. IA has implemented these procedures to ensure proper internal controls in compliance with Departmental guidance and OMB Circular A-123, Appendix B.

#### 4. Procedures

Charge card transactions are posted against a Master Accounting Code (MAC) that is maintained by the Regional Charge Card A/OPC. When a new charge card account is created in JP Morgan's PaymentNet system and interfaced to FBMS, the account assignment used for the MAC is a default account assignment established based on the account type and the region associated with the account. Regional A/OPCs must update the MAC from the default account assignment to an account assignment that should be used for a majority of charge card

transactions. If any transactions post prior to the MAC being updated, or if there is not any budget availability in the updated MAC, the transaction will post directly to the regional default account. To properly reflect the expenses for a given program, the following procedure will be followed to reallocate the transactions.

Upon receipt of the charge card statement, the cardholder will review the charges for correctness and make any necessary notations on the statement. As part of the review, the cardholder will identify any transactions that require accounting changes. The cardholder will sign the statement and submit the statement, along with the required accounting changes, to the supervisor for review and approval. The changes requested should include: the total amount to be moved, as well as a valid Fund, Fund Center, Functional Area, Work Breakdown Structure (WBS) (if applicable), Work Order (WO) (if applicable, e.g. Fleet), Purchase Order (if applicable), and Travel Authorization (if applicable).

If the account is Fleet related, and a change in accounting is necessary, the cardholder will notify the regional property staff so they can update the WO or create a new WO to be used for the reallocation. Once the supervisor has reviewed the changes and signed the statement, a copy of the signed statement is provided to the Servicing Finance Office within five (5) days after the end of the 30 day cycle.

In circumstances where the reallocation will be to a different region or budget responsibility area, confirmation to reallocate to this accounting string shall be obtained from the region/office *prior* to reallocation. An example would be if the Office of the Chief Financial Officer received a charge that belongs to the Office of the Chief Information Officer. This step will ensure the accounting string provided has sufficient funds available to receive the charges and avoid the transaction from further defaulting. This step will not apply to the central unfunded account discussed below.

The Servicing Finance Office will complete corrections within 15 days of receipt of the statement, but no more than 45 days after the billing date of the statement. If the Servicing Finance Office is unable to complete the changes due to incorrect accounting data, they shall reach out to the submitting office for clarification. The submitting office shall provide corrected accounting information within two (2) working days of request. Once the request has been completed, the Servicing Finance Office will notify the submitting office that the action was successful.

When the MAC has an invalid accounting string, the charge will go through a defaulting scheme. The current configuration attempts to post the charges to regional default accounts. In some circumstances, the charges may default to a central account. This account is an unfunded account. As a result, these charges must be moved to funded accounts. Regions are encouraged to review these charges regularly and make adjustments to the proper accounting string. All charges not reallocated out of the central account will be moved to a regional account 30 days after defaulting.

Central Office prepares a weekly default report that is posted to the Sharepoint/IACT site. Charge card A/OPCs and Accounting Officers are notified when the report has been posted. The

report lists all transactions hitting a default account that require a reallocation. It also provides an aging analysis that displays how long the transaction has been posted to the default account. Additionally, a second report is prepared on a monthly basis by Central Office that lists all charge accounts that require a MAC update. This report is sent to the Regional A/OPCs for immediate action. The report lists all accounts that would default if a transaction were to be processed prior to the MAC update.

FBMS Work Step Instructions (WSI) and related training materials are updated regularly to reflect software and process enhancements. The most current WSI can be accessed by logging into the FBMS/PMO Portal

here: https://www.fbms.doi.net/irj/portal/anonymous?guest\_user=Anon\_DOI

The IA Charge Card Manual and other guidance can be found on the Charge Card Support webpage here: <a href="http://iiamabqzucmw01p.ia.doi.net:16200/inside.indianaffairs/Org/AS-IA/OCFO/AP/CCS/index.htm">http://iiamabqzucmw01p.ia.doi.net:16200/inside.indianaffairs/Org/AS-IA/OCFO/AP/CCS/index.htm</a>

#### 5. Authorities

### A. Statues and Regulations:

- 1) Federal Acquisition Regulation (FAR): <a href="http://www.acquisition.gov/far/html/FARTOCP07.html">http://www.acquisition.gov/far/html/FARTOCP07.html</a>
- 2) DOI Departmental Manual: <a href="http://elips.doi.gov/elips/0/fol/1338/Row1.aspx">http://elips.doi.gov/elips/0/fol/1338/Row1.aspx</a>
- General Services Administration Acquisition Regulation
  (GSAR): <a href="http://www.acquisition.gov/gsam/current/html/GSAMTOC501.html#wp436256">http://www.acquisition.gov/gsam/current/html/GSAMTOC501.html#wp436256</a>
- 4) Principles of Federal Appropriations Law, Vol. I, Chapter 5: Bona Fide Needs Rule: http://www.gao.gov/assets/210//202437.pdf
- 5) OMB Circular A123: <a href="http://www.whitehouse.gov/sites/default/files/omb/assets/agencyinformation\_circulars\_pdf/a123\_appendix\_b.pdf">http://www.whitehouse.gov/sites/default/files/omb/assets/agencyinformation\_circulars\_pdf/a123\_appendix\_b.pdf</a>

#### B. Guidance

- 1) DOI Integrated Charge Card Program Policy Guidance
- 2) FBMS Segregation of Duties (SoD) Policy

6. Approval

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Deputy Assistant Secretary - Indian Affairs (Management)

7/11/14 Date